

January 29, 2018

Ms. Ann Bailey
Branch Chief
Energy Star Products
U.S. Environmental Protection Agency
(EnergyStarProducts@energystar.gov)

Re: Ice-O-Matic Comments on ENERGY STAR Standard Operation Procedure, Revising or Establishing an ENERGY STAR Product Specification

Dear Ms. Bailey:

The following comments are submitted by Mile High Equipment, LLC. (Ice-O-Matic). We are a 60 year old manufacturer of commercial ice machines and related equipment located in Denver, Colorado. Ice-O-Matic employs a highly diverse workforce of over 200 individuals where we manufacture over 97% of all the ice machines we market. These ice machines are shipped throughout the United States and around the world. We are proud of our ability to effectively compete in the global market from right here in the United States. A significant number of our ice machines are Energy Star rated and we continue to pursue new technologies and systems to better serve our customers and the environment.

Comment Periods

We agree with EPA's recommendation of a four week comment period for framework documents and draft proposals but EPA is only recommending a two week period for interim decision memos and final draft specifications. Within the standard EPA process, a final draft is intended to reflect the resolution of issues from the draft stage and would generally not be introducing any new or changed items in this stage thus two weeks would seem adequate. For times that new issues are brought up or changes made, EPA has stated it could extend the comment period. Ice-O-Matic would recommend for simplicity sake that both periods be set at four weeks thus eliminating the need for requested extensions.

Data Transparency

Ice-O-Matic agrees with data transparency as long as manufacturers' confidential information can be protected.

Use of Industry Standards

The continued use of industry standards is vital to the on-going success of the ENERGY STAR program. Standards for automatic commercial ice machines are readily available in various locations such as AHRI. The development and use of new ENERGY STAR specific standards would be inconsistent with the ENERGY STAR program and its mission.



George Parsons
Vice President, Engineering

Alignment with DOE Standards

Ice-O-Matic believes leveraging and better aligning with DOE processes and standards is critical to the future success of the program. As new versions of DOE standards are issued and compliance data submitted by manufacturers, alignment and use of this data in the DOE system could be used for awarding ENERGY STAR compliance would greatly reduce regulatory burden. In the system of today, Ice-O-Matic is required to submit the same information and data to two places, DOE and EPA ENERGY STAR. With just some minor updates and changes it would seem possible for manufacturer's like Ice-O-Matic to submit the data to DOE and then ENERGY STAR could use this same data to award ENERGY STAR certification.

Sincerely,

George Parsons
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